

Case Name: Watson v. City of NY, et al. Case Number: 23-CV-08975 (LDH) (TAM)

<b>CASE MANAGEMENT WORKSHEET</b>			
<u>Preparation for Initial Conference</u>			
<b>Rule 26(f) conference held?</b>	Date: <b>4/5/24</b>		
<b>Deadline for Rule 26(a) initial disclosures and any HIPAA-compliant records authorizations:</b>	<b>4/15/24</b>		
<b>Procedures discussed for producing Electronically Stored Information (ESI)?</b>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A
<b>Confidentiality Order to be submitted for Court approval?</b>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A
<b>Anticipated number of depositions:</b>	Plaintiff(s): 5-10 Defendant(s): 1-3		
<b>First requests for production of documents and for interrogatories due by:</b>	<b>5/14/24</b>		
<u>Proposed Deadlines for Pre-Settlement Discovery (Phase I)</u>			
<b>Agreed upon completion date for Phase I Discovery:</b> (Reciprocal agreed upon document production and other discovery necessary for a reasoned consideration of settlement. Presumptively 60 days after Initial Conference.)	<b>6/17/24</b>		
<b>Date for pre-settlement status conference with counsel:</b> (Proposed date to report the parties' preparedness for mediation or a settlement conference. Presumptively 10-15 days after the completion of Phase I Discovery.)	<b>7/9/24</b>		
<u>Proposed Deadlines for Discovery and Motion Practice (Phase II)</u>			
<b>Deadline to join new parties or amend pleadings as of right:</b> (Presumptively 15 days after initial settlement conference)	<b>7/24/24</b>		
<b>All fact discovery completed by:</b> (Presumptively 3.5 months after first requests for documents/interrogatories)	<b>8/27/24</b>		
<b>Joint status report certifying close of fact discovery:</b>	<b>9/10/24</b>		
<b>Anticipated number of expert reports:</b>	Plaintiff(s): 1 Defendant(s): 1		

<b>Exchange of expert disclosures completed by:</b> (Presumptively 30 days after fact discovery)	<b>9/27/24</b>	
<b>Expert depositions completed by:</b> (Presumptively 30 days after initial expert disclosures)	<b>10/28/24</b>	
<b>Exchange of rebuttal expert reports by:</b> (Presumptively 30–45 days after initial expert disclosures)	<b>11/13/24</b>	
<b>All expert discovery completed by:</b>	<b>11/20/24</b>	
<b>CERTIFICATION OF THE COMPLETION OF ALL DISCOVERY BY:</b> (Presumptively 9 months after Initial Conference)	<b>1/17/25</b>	
<b>Final date to take first step in dispositive motion practice:</b> (Parties are directed to consult the District Judge's Individual Rules regarding such motion practice. Presumptively 30 days after completion of all discovery.)	<b>2/24/25</b>	
<b>Do the parties wish to be referred to EDNY's mediation program pursuant to Local Rule 83.8?</b>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
<b>Do the parties consent to trial before a Magistrate Judge pursuant to 28 U.S.C. § 636(c)?</b> (The fillable consent form may be found at <a href="https://www.uscourts.gov/forms/civil-forms/notice-consent-and-reference-civil-action-magistrate-judge">https://www.uscourts.gov/forms/civil-forms/notice-consent-and-reference-civil-action-magistrate-judge</a> . Consenting does not affect a party's right to a jury trial.)	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

SO ORDERED:

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**TARYN A. MERKL**  
 United States Magistrate Judge

\_\_\_\_\_  
**DATE**